

JOSEPH D. MARCHAND, ESQUIRE, TRUSTEE
117-119 West Broad Street
P.O. Box 298
Bridgeton, New Jersey 08302
(856) 451-7600
JM:5998

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN THE MATTER OF:	}	In Bankruptcy Proceeding:
	}	Chapter 7
Edward Quinn, III &	}	Case No. 14-34314/GMB
Catherine Quinn,	}	
	}	
	}	
Debtor(s)	}	
	}	
	}	CERTIFICATION IN OPPOSITION
	}	TO MOTION TO VACATE
	}	AUTOMATIC STAY

Returnable: April 14, 2015 @ 10:00 A.M.
(Disposition on the papers)

JOSEPH D. MARCHAND, ESQUIRE, of full age, hereby certify and say:

1. I am the Chapter 7 Bankruptcy Trustee and Attorney for Trustee in the above captioned matter and am fully familiar with the facts and circumstances giving rise to the within matter.

2. I have a Realtor ready to market the Property located at 2316 South Bayview Avenue, #1, Seaside Park, NJ. I offer the following analysis:

	\$ 425,000.00	– Fair market value
-	\$ 122,015.00	– Mortgage payoff (Aurora)
-	\$ 246,000.00	– 2 nd Mortgage payoff (TD Bank)
-	<u>\$ 25,500.00</u>	– Real estate broker fee
	\$ 35,735.00	
-	<u>\$ 24,500.00</u>	– Trustee Commission
	\$ 6,985.00	– Available for general unsecured creditors

4. The 2nd Mortgage is held with TD Bank and the Trustee is attempting to negotiate a carve out so that General Unsecured Creditors would benefit from a Sale.

5. In light of the aforesaid, it is respectfully requested that the Motion to Vacate Stay filed by Aurora Financial be denied so the Trustee be given an opportunity to Market the Property for benefit of General Unsecured Creditors.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: March 25, 2015

/s/ Joseph D. Marchand
JOSEPH D. MARCHAND, ESQ., TRUSTEE